

Exhibit 6

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JARROD STRINGER, et al.,	*	
Plaintiffs,	*	
	*	
v.	*	No. SA-20-CV-46-OG
	*	
RUTH R. HUGHS, et al.,	*	
Defendants.	*	

VIDEOCONFERENCED DEPOSITION

OF

NALYELI GOMEZ

Friday, April 10, 2020

VIDEOCONFERENCED DEPOSITION OF NALYELI GOMEZ,
produced as a witness at the instance of the Defendants,
and duly sworn, was taken in the above-styled and
numbered cause on Friday, April 10, 2020, from
10:11 a.m. to 11:03 a.m., before Debbie D. Cunningham,
CSR, in and for the State of Texas, remotely reported
via Machine Shorthand, pursuant to the Federal Rules of
Civil Procedure.

--ooOoo--

1 A. After graduating two, two more jobs.

2 **Q. And what were those?**

3 A. Before that -- I forgot the name of the
4 company, but it was a call center. And before that, I
5 was the data director for the Texas Democratic Party.

6 **Q. How long were you the data director for the**
7 **Texas Democratic Party?**

8 A. I don't remember exactly. It was a few
9 months.

10 **Q. Okay. Focusing on your job today with the**
11 **Texas Organizing Project, what are your job duties?**

12 A. So I manage their data -- well, the database.
13 That's what I do.

14 **Q. Can you tell me a little bit more about what**
15 **that entails?**

16 A. It's a long list, but basically making sure
17 that the data is being entered correctly into the
18 database and I decide what goes in there and what
19 doesn't. Yeah, that's like a basic summary.

20 **Q. And so what sort of data are you working with?**

21 A. It is -- so we have members and supporters, so
22 data about them. Like, whoever contacted them, we keep
23 track of that, any other details. Maybe if there's an
24 election going on, people go canvas or phone bank. So
25 any data we collect from there -- or from that.